

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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L.V. et al.,

Plaintiffs,

1:19-cv-05451-AT-KHP

**PLAINTIFFS' PROPOSED
DISCOVERY ORDER FOR
DEFENDANT'S DOCUMENT
PRODUCTION AND
INFORMATION DISCLOSURE**

-v-

NEW YORK CITY DEPARTMENT OF
EDUCATION,

Defendant.
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KATHARINE H. PARKER, Magistrate Judge:

Defendant New York City Department of Education is hereby ordered to produce the following books, papers, records, and data on or

before _____ {date} to Plaintiffs' Counsel via email to Oroma@MSRLegal.Org or mail to 503 Linden Street, West Hempstead, New York 11552:

- (1) A certified written statement from a duly authorized New York City Department of Education ("Department" or "Defendant") official detailing payments made by the Department for the provision of special education instruction and related services to J.V.2 from June 6, 2018 through and including June 30, 2019, with such statement specifying the date of service, type of service rendered (including specialized transportation), duration of service session in minutes, name of provider (individual and/or agency) of such service to J.V.2; location of session; and date of payment remittance to provider;

i.e., a chart as follows:

	Special Education Instruction or Related Service Provided	Duration of Service Session (in minutes)	Name of Provider (Individual and/or Agency)	Location of Service (in-home, center, school, etc.)	Cost of Service	Date of Payment Remittance to Provider
{ Date of Service }						

{Date of Service}						
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- (2) A certified written statement from a duly authorized Department official containing an accounting and computation of the number of hours of the services ordered by The Impartial Hearing Officer in Case No. ---606 (*redacted for J.V.2's privacy*) covering the 2017-2018 and 2018-2019 school years, that fall within each of the following four categories -- RECEIVED, PAID FOR, INVOICED, and NOT PROVIDED -- since June 6, 2018, with "RECEIVED" meaning the services actually received by J.V.2; "PAID FOR" meaning, the Department has remitted payment to service provider for services received by J.V.2; "INVOICED" meaning services already rendered by a provider for which the provider has not received payment from the Department; and "NOT PROVIDED" meaning the services ordered by The Impartial Hearing Officer that J.V.2 has not received;

And

- (3) All of J.V.2's documents and logs maintained in the Department's Special Education Student Information System ("SESIS") including J.V.2's profile, related service session notes and progress reports, and J.V.'s service calendar for One-to-One Instruction, Special Education Itinerant Teacher services, Applied Behavior Analysis, Occupational Therapy, Physical Therapy, Speech-Language Therapy, Specialized Transportation, and other related service(s) and instruction.

Further, Plaintiffs' Counsel reserves the right to depose such Department official(s) referenced herein.

SO ORDERED.

Dated: September _____, 2020
New York, New York

KATHARINE H. PARKER
United States Magistrate Judge